

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-cv-60984-Augustin-Birch

[Consent Case]

MELINDA MICHAELS,

Plaintiff,

v.

SEAWATER PRO LLC, and  
MICHAEL SPANOS A/K/A MIKE SPANOS,

Defendants.

DECLARATION OF ERNST SANTHAGENS

I, ERNST SANTHAGENS, declare:

1. I am over eighteen years of age; I live in the United States, and I personally know of the matter set forth herein. I understand the English language and completely understand the contents of this Declaration.
2. I am a witness in the case of *Michael v. SeaWater Pro LLC et al*, Case No. 24-cv-60984-Augustin-Birch, in the United States District Court, for the Southern District of Florida ("Lawsuit").
3. I have known the Plaintiff Melinda Michaels and the Defendant Michael Spanos for more than nine years.
4. I met Melinda Michaels and Michael Spanos, when Melinda Michaels purchased the boat located at 37 Hendricks Isle, Ft. Lauderdale, FL 33301.
5. I witnessed Plaintiff Melinda Michaels and Defendant Michael Spanos develop the watermaker on the docks of Hendricks Isle, where we all lived in the beginning of the company.
6. I specifically remember a conversation I had with Defendant Michael Spanos, where I told him "you need a box where you put seawater in, and freshwater out, and make it as small as you can make it to go on boats."

7. I have knowledge that during the formation of SeaWater Pro LLC, it was Melinda Michaels' capital that would cover expenses of the Defendants when they themselves could not pay those.

8. I was employed by the Defendants SeaWater Pro LLC, and Michael Spanos off and on from approximately 2018 through 2021.

9. My employment periods with the Defendants spanned approximately one-to-two-week periods, totaling approximately eight to ten times over the four-year period.

10. The Defendants Michael Spanos and SeaWater Pro hired me to do build the portable units and panels at approximately \$25/hr that was paid in cash.

11. During the periods of my employment with Defendants, my wife would accompany me to the Defendants' workshop/assembly location, wait for me to work for the day, and then leave with me.

12. My employment with Defendants eventually terminated approximately four years ago, largely to my wife's illness.

13. During each of the periods of my employment with Defendants, I witnessed Melinda Michaels working for the Defendants.

14. Michael Spanos directly supervised Melinda Michaels.

15. I witnessed Michael Spanos telling Melinda Michaels specific tasks to perform including "order these parts", "do research on that", "fill this order", etc.

16. I witnessed Melinda Michaels performing the tasks delegated to her by Michael Spanos that were necessary in helping the Defendants' business run efficiently.

17. I witnessed Melinda Michaels being the commercial spokesperson, "the face of", and promoting the Defendants' business in commercials and other advertising.

18. I witnessed Melinda Michaels running hoses in the water and performing testing on the watermakers.

19. I witnessed Melinda Spanos always already on site working whenever I arrived in the morning.

20. I witnessed Melinda Michaels always still on site working whenever I left in the evenings.

21. I witnessed Melinda Michaels working long hours and working each and every day that I was also there working for Defendants.

22. I witnessed Melinda Spanos covering duties at work for SeaWater Pro for Defendant Michael Spanos when he had medical issues related to his heart.

23. Throughout the years working at Sea Water Pro and for Michael Spanos, Melinda Michaels was always extremely busy at work, and always accommodating to the Defendants' requests made on her.

I declare under penalty of perjury under 28 U.S. Code § 1746 the foregoing is true and correct to the best of my knowledge and belief.

  
ERNST SANTHAGENS

06/25/2025  
Date